

Joel G. MacMull, Partner

jmacmull@mblawfirm.com 973.295.3652 Direct

3 Becker Farm Road Roseland, New Jersey 07068 973.736.4600 Main 973.325.7467 Fax

570 Lexington Avenue, 21st Floor New York, New York 10022 212.776.1834 Main www.mblawfirm.com

December 6, 2022

VIA ECF & FACSIMILE (212-805-7942)

Hon. Alvin K. Hellerstein, U.S.D.J. United States District Court Southern District of New York 500 Pearl Street New York, New York 10007-1312

Re: Roam Luggage, Inc. v. Harper + Scott, &

Case No. 22-cv-4525 (AKH)

Dear Judge Hellerstein:

We are counsel to Roam Luggage, Inc. ("Roam") in the above-captioned matter. Pursuant to § 1.D of Your Honor's Individual Rules, we write to request a brief adjournment of the parties' initial case management conference currently scheduled for December 9, 2022 at 10:00 a.m. Defendants join Roam in making this request.

Pursuant to Fed. R. Civ. P. 6(b)(1)(A), the parties submit good cause exists for this requested adjournment. The parties are presently engaged in settlement discussions that, with any luck, will resolve this matter entirely. Moreover, the undersigned is currently recovering from Covid-19.

In further compliance with Your Honor's Rules, the parties advise as follows:

- 1. No prior request for an adjournment of the above-referenced conference has been made.
- 2. The parties' jointly propose their initial case management conference be rescheduled for sometime in mid-January 2023.

Casse 1:22-ev-045255-AKHI POSLUMENT 276 FIREL 112/108/22 Pagge 2:0f2

Hon. Naomi Reice Buchwald, U.S.D.J. December 6, 2022 Page 2 of 2



Naturally, we are available at the Court's convenience should it have any questions or concerns.

Respectfully submitted,

Joel G. MacMull

cc: All Counsel of Record (via ECF only)